

Exhibit 2

to February 28, 2025 Letter to the Honorable Julien X. Neals, U.S.D.J.
Jennifer Michaels, M.D. v. Rutgers, the State University of New Jersey, et al.
Civil Action No.: 2:15-cv-07603-JXN-CLW

From: Aversa, Robyn L. (Berkeley Heights) Robyn.Aversa@jacksonlewis.com ✉
Subject: RE: Meet and Confer

Date: February 14, 2025 at 3:55 PM

To: Neil Cartusciello ncartusciello@cklawllc.com, Bennett, John K. (Berkeley Heights) John.Bennett@jacksonlewis.com,
Posluszny, Linda J. (Berkeley Heights) Linda.Posluszny@jacksonlewis.com

Cc: Cesario, Millie (Berkeley Heights) Millie.Cesario@jacksonlewis.com

Neil, thank you for your email. Attached are Defendants' counter proposals. I am sending in clean copy because with all the edits in track changes, they were unreadable. Please let me know when you are available to speak.

Robyn



Robyn L. Aversa
Attorney at Law

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Suite 2000

Berkeley Heights, NJ 07922

Direct: 908-795-5128 | Main: (908) 795-5200

Robyn.Aversa@jacksonlewis.com | www.jacksonlewis.com

From: Neil Cartusciello <ncartusciello@cklawllc.com>

Sent: Friday, February 14, 2025 12:14 PM

To: Bennett, John K. (Berkeley Heights) <John.Bennett@jacksonlewis.com>; Aversa, Robyn L. (Berkeley Heights) <Robyn.Aversa@jacksonlewis.com>; Posluszny, Linda J. (Berkeley Heights) <Linda.Posluszny@jacksonlewis.com>

Subject: Fwd: Meet and Confer

Dear John, Robyn and Linda,

I am following up on the email I sent you last Friday.

Please let me know some dates and times when you are available to meet and confer concerning the Confidentiality and No Rehire provisions.

Thank you and have a nice weekend.

- Neil

Begin forwarded message:

Begin forwarded message.

From: Neil Cartusciello <ncartusciello@cklawllc.com>
Subject: Meet and Confer
Date: February 7, 2025 at 5:15:57 PM EST
To: "Bennett, John K. (Berkeley Heights)" <john.bennett@jacksonlewis.com>, "Aversa, Robyn L. (Berkeley Heights)" <robyn.aversa@jacksonlewis.com>, "Posluszny, Linda J. (Berkeley Heights)" <Linda.Posluszny@jacksonlewis.com>

Hi, John, Robyn and Linda,

In light of Judge Neals' text order today, please let me know some dates and times when you are available to meet and confer concerning the Confidentiality and No Rehire provisions.

Thank you and have a nice weekend.

- Neil

Neil Cartusciello
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Proposed Section 5
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Proposed Section 6
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